

# **EXHIBIT B**

**Robyn Davis**

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**From:** David Thomas  
**Sent:** Tuesday, June 20, 2017 5:54 PM  
**To:** Edward Wallace  
**Cc:** Michael Bowman; Aaron Arthur  
**Subject:** Re: [EXTERNAL] RE: TVM Ethicon Wave 5 - Plaintiff General Expert Reports

Done. At Butler Snow at 9:00 am?

On Jun 20, 2017, at 5:01 PM, Edward Wallace <[EAW@wexlerwallace.com](mailto:EAW@wexlerwallace.com)> wrote:

Let's make June 30 work if we can.

On Jun 19, 2017, at 3:59 PM, David Thomas <[DThomas@tcspllc.com](mailto:DThomas@tcspllc.com)> wrote:

Any news here?

**From:** Michael Bowman [<mailto:MHB@wexlerwallace.com>]  
**Sent:** Tuesday, June 13, 2017 7:13 PM  
**To:** David Thomas <[DThomas@tcspllc.com](mailto:DThomas@tcspllc.com)>  
**Cc:** Edward Wallace <[EAW@wexlerwallace.com](mailto:EAW@wexlerwallace.com)>  
**Subject:** Re: [EXTERNAL] RE: TVM Ethicon Wave 5 - Plaintiff General Expert Reports

David, we can offer July 14, and are working on getting you more.

On Jun 13, 2017, at 16:56, David Thomas <[DThomas@tcspllc.com](mailto:DThomas@tcspllc.com)> wrote:

Mike--All of those dates are after the close of discovery (July 19). We will not give up our responsive experts until yours are deposed. Please find dates that will allow the parties to comply with the scheduling order.

On Jun 13, 2017, at 4:43 PM, Michael Bowman <[MHB@wexlerwallace.com](mailto:MHB@wexlerwallace.com)> wrote:

David, these are the dates we have available for Dr. Guelcher's deposition.

Wednesday 7/19  
Thursday 7/20  
Friday 7/21  
Tuesday 7/25  
Wednesday 7/26  
Thursday 7/27

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**From:** David Thomas [<mailto:DThomas@tcspllc.com>]  
**Sent:** Tuesday, June 13, 2017 4:35 PM

**To:** Michael Bowman

**Subject:** RE: [EXTERNAL] RE: TVM Ethicon Wave 5 - Plaintiff General Expert Reports

Mike—it's been three weeks. Please work with me. Thanks.

David

**From:** Michael Bowman

[mailto:MHB@wexlerwallace.com]

**Sent:** Saturday, June 10, 2017 3:39 PM

**To:** David Thomas <DThomas@tcspllc.com>

**Cc:** Fitzpatrick, Fidelma <ffitzpatrick@motleyrice.com>;

Edward Wallace <EAW@wexlerwallace.com>; Betsy

Williams <BWilliams@awkolaw.com>; Cope, Breanne

<bcope@motleyrice.com>;

christy.jones@butlersnow.com;

william.gage@butlersnow.com; Bryan Aylstock

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Chad Hutchinson (Chad.Hutchinson@butlersnow.com)

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<Doug@monsourlawfirm.com>; Katy Krottinger

(External) <Katy@monsourlawfirm.com>; Nate Jones

<njones@wcllp.com>; Michelle Goldwasser

<mgoldwasser@wcllp.com>

**Subject:** Re: [EXTERNAL] RE: TVM Ethicon Wave 5 - Plaintiff General Expert Reports

Dr. Guelcher has a very busy month. We should have dates to you quickly.

On Jun 10, 2017, at 14:04, David Thomas <DThomas@tcspllc.com> wrote:

Have now scheduled Mays and Ostergard. Still need Guelcher. Thank you.

David

**From:** Fitzpatrick, Fidelma

[mailto:ffitzpatrick@motleyrice.com]

**Sent:** Friday, June 9, 2017 4:40 PM

**To:** David Thomas

<DThomas@tcspllc.com>; Wallace,

Edward <EAW@wexlerwallace.com>;  
Betsy Williams  
<BWilliams@awkolaw.com>; Cope,  
Breanne <bcope@motleyrice.com>  
**Cc:** [christy.jones@butlersnow.com](mailto:christy.jones@butlersnow.com);  
[william.gage@butlersnow.com](mailto:william.gage@butlersnow.com); Bryan  
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<RBaggett@awkolaw.com>;  
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Aaron Arthur <AArthur@tcspllc.com>;  
Burt Snell ([Burt.Snell@butlersnow.com](mailto:Burt.Snell@butlersnow.com))  
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<[jperduejr@perdueandkidd.com](mailto:jperduejr@perdueandkidd.com)>; Jeff  
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Michael Bowman  
<MHB@wexlerwallace.com>; Nate  
Jones <[njones@wcllp.com](mailto:njones@wcllp.com)>; Michelle  
Goldwasser <[mgoldwasser@wcllp.com](mailto:mgoldwasser@wcllp.com)>  
**Subject:** RE: [EXTERNAL] RE: TVM  
Ethicon Wave 5 - Plaintiff General  
Expert Reports

Breanne Cope will get you dates for Dr.  
Ostergard shortly. Thanks.

**Fidelma Fitzpatrick** | Attorney at Law |  
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02903  
o. 401.457.7728 x7728 | f.  
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[ffitzpatrick@motleyrice.com](mailto:ffitzpatrick@motleyrice.com)

**From:** David Thomas  
[<mailto:DThomas@tcspllc.com>]  
**Sent:** Friday, June 09, 2017 2:22 PM  
**To:** Wallace, Edward  
<EAW@wexlerwallace.com>; Betsy  
Williams <BWilliams@awkolaw.com>  
**Cc:** [christy.jones@butlersnow.com](mailto:christy.jones@butlersnow.com);  
[william.gage@butlersnow.com](mailto:william.gage@butlersnow.com); Bryan

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Aaron Arthur <AArthur@tcspllc.com>;  
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Breanne <bcope@motleyrice.com>;  
Michael Bowman  
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Jones <njones@wcllp.com>; Michelle  
Goldwasser <mgoldwasser@wcllp.com>  
**Subject:** [EXTERNAL] RE: TVM Ethicon  
Wave 5 - Plaintiff General Expert  
Reports

Mays scheduled. Still waiting for  
Ostergard and Guelcher. Schedules  
getting tight. Please advise. Thanks.

David

**From:** Edward Wallace  
[mailto:EAW@wexlerwallace.com]  
**Sent:** Thursday, June 1, 2017 12:59 PM  
**To:** David Thomas  
<DThomas@tcspllc.com>; Betsy  
Williams <BWilliams@awkolaw.com>  
**Cc:** christy.jones@butlersnow.com;  
william.gage@butlersnow.com; Bryan  
Aylstock <BAylstock@awkolaw.com>;  
Renee Baggett  
<RBaggett@awkolaw.com>;  
tcartmell@wcllp.com; Chad Hutchinson  
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Krottinger (External)  
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Breanne <[bcope@motleyrice.com](mailto:bcope@motleyrice.com)>;  
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<[MHB@wexlerwallace.com](mailto:MHB@wexlerwallace.com)>; Nate  
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**Subject:** RE: TVM Ethicon Wave 5 -  
Plaintiff General Expert Reports

I will be getting you dates for Guelcher,  
Jim or Doug will get you dates for Mays  
and Fidelma will get you dates for  
Ostergard. We plan to serve cross-  
notices to preserve their testimony for  
all cases.

**From:** David Thomas  
[<mailto:DThomas@tcspllc.com>]  
**Sent:** Wednesday, May 31, 2017 10:38  
AM  
**To:** Betsy Williams  
<[BWilliams@awkolaw.com](mailto:BWilliams@awkolaw.com)>  
**Cc:** [christy.jones@butlersnow.com](mailto:christy.jones@butlersnow.com);  
[william.gage@butlersnow.com](mailto:william.gage@butlersnow.com); Bryan  
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Cope, Breanne  
<[bcope@motleyrice.com](mailto:bcope@motleyrice.com)>; Michael

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Michelle Goldwasser  
<[mgoldwasser@wcllp.com](mailto:mgoldwasser@wcllp.com)>  
**Subject:** Re: TVM Ethicon Wave 5 -  
Plaintiff General Expert Reports

Counsel--following up. Please  
advise. Thanks.

David

On May 25, 2017, at 5:25 PM, Betsy  
Williams <[BWilliams@awkolaw.com](mailto:BWilliams@awkolaw.com)>  
wrote:

Mr. Thomas,  
I apologize for the delay  
in responding. I am  
including other  
members of the  
leadership team to  
assist with your request  
as outlined below.  
Thanks,  
Betsy

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**Betsy D. Williams**  
Executive Assistant to Bryan Aylstock  
Aylstock, Witkin, Kreis & Overholtz

17 E. Main Street, Suite 200  
Pensacola, FL 32502  
Phone: (850) 202-1010  
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Email: [bwilliams@awkolaw.com](mailto:bwilliams@awkolaw.com)

---

**From:** David Thomas  
[<mailto:DThomas@tcspilc.com>]  
**Sent:** Wednesday, May  
24, 2017 1:45 PM  
**To:** Betsy Williams;  
[christy.jones@butlersnow.com](mailto:christy.jones@butlersnow.com);  
[william.gage@butlersnow.com](mailto:william.gage@butlersnow.com)  
**Cc:** Bryan Aylstock;  
Renee Baggett;  
[tcartmell@wcllp.com](mailto:tcartmell@wcllp.com);  
Chad Hutchinson

([Chad.Hutchinson@butlersnow.com](mailto:Chad.Hutchinson@butlersnow.com)); Aaron Arthur; David Thomas; Burt Snell ([Burt.Snell@butlersnow.com](mailto:Burt.Snell@butlersnow.com))

**Subject:** RE: TVM  
Ethicon Wave 5 -  
Plaintiff General Expert  
Reports

Ms. Williams and  
counsel—

Please provide dates  
and locations for the  
depositions of  
Guelcher, Mays and  
Ostergard. I expect  
that you will be  
receiving additional  
requests for other  
witnesses where  
depositions are  
necessary. Thank you  
for your attention to  
this request.

David Thomas

**From:** Betsy Williams  
[<mailto:BWilliams@awkolaw.com>]

**Sent:** Monday, May 22,  
2017 8:46 PM

**To:**  
[christy.jones@butlersnow.com](mailto:christy.jones@butlersnow.com);  
[william.gage@butlersnow.com](mailto:william.gage@butlersnow.com); David Thomas  
<[DThomas@tcspllc.com](mailto:DThomas@tcspllc.com)>  
>

**Cc:** Bryan Aylstock  
<[BAylstock@awkolaw.com](mailto:BAylstock@awkolaw.com)>; Renee Baggett  
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[tcartmell@wcllp.com](mailto:tcartmell@wcllp.com)

**Subject:** TVM Ethicon  
Wave 5 - Plaintiff  
General Expert Reports



Good afternoon,

Below is a Dropbox  
link to the general  
expert reports for  
Wave 5:

<https://www.dropbox.com/sh/o7o0x2f3xikoags/AADJFjzH9gQWwhZwyyj628bOa?dl=0>

I am attaching the  
certificate of service  
and the list of all  
experts with their  
contact information  
and the exhibit A  
which details which  
products they  
provided a report on.

Feel free to let us  
know if you have any  
questions or any  
problems opening the  
attachments/DB link.

Thanks,

Betsy

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**Betsy D. Williams on behalf of Bryan Aylstock**  
Executive Assistant to Bryan Aylstock  
Aylstock, Witkin, Kreis & Overholtz

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